

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) Chapter 11
)
STEWARD HEALTH CARE SYSTEM,) Case No. 24-90213 (CML)
LLC, *et al.*,)
) Jointly Administered
Debtors.¹)
)

LIMITED OBJECTION AND RESERVATION OF RIGHTS

University of Colorado Health, a Colorado non-profit corporation (“UCHealth”), a creditor in the above-captioned bankruptcy case, hereby files its *Limited Objection and Reservation of Rights* (this “**Limited Objection**”). In support of the Limited Objection, UCHealth states as follows:

Limited Objection

1. On May 30, 2025, the Debtors filed their *Joint Chapter 11 Plan of Liquidation of Steward Health Care System LLC and its Affiliated Debtors* (Docket No. 5021) (the “**Plan**”).
2. Article 12.5 of the Plan provides for a broad injunction against creditors holding claims against the Debtors from:

(D) *asserting any right of setoff, subrogation, or recoupment of any kind against any obligation due from such Entities or against the property of such Entities on account of or in connection with or with respect to any such claims, Interests, or Causes of Action unless (x) such Entity has timely asserted such setoff right either in a filed proof of Claim, or in another document filed with the Bankruptcy Court explicitly preserving such setoff or that otherwise indicates that such entity asserts, has, or intends to preserve any right of setoff pursuant to applicable law or otherwise . . .*

Docket No. 5021 at Art. 12.5 (emphasis added).

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

3. UCHealth previously filed its proofs of claim against the Debtors' estates at Claim Nos. 10347 and 12777 (collectively, the "Claims"). Both of the Claims already explicitly assert UCHealth's rights of setoff and recoupment. *See* Claim No. 10347 at ¶¶ 9 and 11; Claim No. 12777 at ¶ 12. For the avoidance of doubt, through this Limited Objection, UCHealth asserts and preserves its rights of setoff and recoupment in accordance with applicable law.

4. To the extent not inconsistent with this Limited Objection, UCHealth joins the objections filed at Docket Nos. 5186, 5275, 5279 and any other similar objection filed hereafter.

Reservation of Rights

5. UCHealth reserves all rights to enforce provisions in any relevant contracts with the Debtors for any obligations, which may have accrued under such contracts prior to their assumption or rejection, even if such amounts have not yet been discovered. UCHealth reserves all rights with regard to its Claims filed in this matter including the right to amend its Claims. UCHealth reserves all rights to supplement this Limited Objection. By filing this Limited Objection, UCHealth does not waive (1) UCHealth's right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (2) UCHealth's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (3) any other rights, claims, actions, defenses, set off or recoupments to which UCHealth may be entitled.

WHEREFORE, UCHealth respectfully requests that its rights be reserved in a manner consistent with the reservations asserted herein and the Court grant such other and further relief as it may deem just and appropriate under the circumstances.

[INTENTIONAL PAGE BREAK – SIGNATURE PAGE FOLLOWS]

Dated: July 2, 2025

FROST BROWN TODD LLP

By:/s/ Rebecca L. Matthews

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2025, a true and correct copy of the foregoing *Limited Objection and Reservation of Rights* was sent via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s / Rebecca L. Matthews
Rebecca L. Matthews

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